

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

.....
HMK ENTERPRISES, INC.,)
ROBERT ACKERMAN and)
STEVEN KAROL.,)
)
Plaintiffs,)
)
v.) Civil Action No. 04 12688 MLW
)
FEDERAL INSURANCE)
COMPANY,)
)
Defendant.)
.....

JOINT MOTION TO CONTINUE STATUS CONFERENCE

HMK Enterprises, Inc., Robert Ackerman and Steven Karol (“Plaintiffs”) and Federal Insurance Company (“Defendant”) hereby jointly move to continue the status conference until the week of April 24 through April 28, 2006, stating as follows:

1. Pursuant to notice from the Court, a status conference in this matter has been scheduled for 10:00 a.m. on April 19, 2006.
2. Undersigned counsel for Plaintiffs wishes to attend the status conference and also to pursue vacation plans related to the school vacation week.
3. All counsel are available at any time on April 24, April 25, April 26, April 27, or April 28, 2006.
4. The parties submit that the relief requested herein will not prejudice either party or the Court.

For the foregoing reasons, the parties request that the Court grant their joint motion to continue the status conference until the week of April 24 through April 28, 2006.

HMK ENTERPRISES, INC.,
ROBERT ACKERMAN and
STEVEN KAROL

FEDERAL INSURANCE COMPANY

By their attorneys,

By its attorneys,

/s/ Martin C. Pentz

/s/ Jonathan A. Constine (by permission (/s/
Martin C. Pentz)

Martin C. Pentz (BBO #394050)
Karen L. Crocker (BBO #658838)
Foley Hoag LLP
155 Seaport Boulevard
Boston, MA 02210
(617) 832-1000
mpentz@foleyhoag.com

Jonathan A. Constine (*pro hac vice*)
Hogan & Hartson, LLP
555 13th Street, N.W.
Washington, D.C. 20004
(202) 637-5870

and

and

Howard M. Cooper (BBO #543842)
Heidi A. Nadel (BBO #641617)
Todd & Weld, LLP
28 State Street
Boston, MA 02110
(617) 720-2626

Stephen J. Abarbanel (BBO #010100)
Lee M. Holland (BBO #650617)
Robinson & Cole LLP
One Boston Place
Boston, MA 02108
(617) 557-5938

Dated: March 9, 2006